

**CHAITMAN LLP**

Helen Davis Chaitman  
Gregory M. Dexter  
465 Park Avenue  
New York, New York 10022  
Phone & Fax: 888-759-1114  
[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)  
[gdexter@chaitmanllp.com](mailto:gdexter@chaitmanllp.com)

*Attorneys for Defendants Carol Nelson and  
Stanley Nelson*

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

CAROL NELSON, individually and as joint tenant,  
and STANLEY NELSON, individually and as joint  
tenant,

Defendants.

Adv. Pro No. 10-04377 (SMB)

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC

Adv. Pro No. 10-04658 (SMB)

Plaintiff,

v.

CAROL NELSON,

Defendant.

**DECLARATION OF HELEN DAVIS CHAITMAN, ESQ. IN OPPOSITION TO  
TRUSTEE'S MOTIONS IN LIMINE NUMBER 1 (TO ADMIT THE PLEA  
ALLOCUTIONS OF BERNARD L. MADOFF AND BLMIS EMPLOYEES) AND  
NUMBER 2 (TO ADMIT THE FORMER TESTIMONY OF FRANK DIPASCALI)**

I, Helen Davis Chaitman, hereby declare:

1. I am a partner with Chaitman LLP, counsel to Defendants in the above-captioned cases. I am a member of the bars of New York and New Jersey, and of this Court.
2. I submit this declaration in opposition to the Trustee's Motions *in limine* Number 1 and Number 2.
3. Attached hereto as **Exhibit A** are true and accurate excerpts from the Transcript of Deposition of Bernard L. Madoff taken April 26, 2017.

I declare pursuant to 28 U.S.C. § 1746 under penalty of perjury that the foregoing is true and correct.

May 1, 2019

/s/ Helen Davis Chaitman

Helen Davis Chaitman  
Chaitman LLP  
465 Park Avenue  
New York, New York 10022  
Phone & Fax: 888-759-1114  
[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)

*Attorneys for Defendants Carol  
Nelson and Stanley Nelson*